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December 16, 2019

By ECF

The Honorable George B. Daniels
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl St., Courtroom 11A
New York, NY 10007-1312

Re: *Parker v. United Industries Corporation*, No. 17-cv-05353 (S.D.N.Y.)

Dear Judge Daniels:

We represent Defendant United Industries Corporation (“UIC”) in the above-captioned action. Pursuant to Rule I.D. of Your Honor’s Individual Practices, we respectfully request leave to file under seal the following documents being submitted to the Court today as part of UIC’s Reply in Support of Defendant’s Motion for Summary Judgment, Response to Plaintiff’s Statement of Additional Material Facts That Present a Genuine Issue for Trial, AND Reply in Support of Defendant’s Motion to Exclude the Reports and Testimony of Colin B. Weir:

1. Exhibits X and Y to the Declaration of Steven T. Rappoport in further Support of UIC’s Motions to Exclude the Reports and Testimony of Colin B. Weir and Dr. Scott W. Gordon;
2. Exhibits W, X, Y, and Z to the Declaration of Jamie A. Levitt in Support of UIC’s Response to Plaintiff’s Statement of Additional Material Facts That Present a Genuine Issue for Trial;
3. Portions of Defendant’s Reply in Support of Motion for Summary Judgment;
4. Portions of Defendant’s Response to Plaintiff’s Statement of Additional Material Facts That Present a Genuine Issue for Trial;
5. Portions of Defendant’s Reply Memorandum of Law in Support of Defendant United Industries Corporation’s Motion to Exclude the Reports and Testimony of Scott W. Gordon.

These documents and deposition transcripts contain proprietary business information that UIC has designated as “Confidential” or “Highly Confidential” under the Stipulated Protective Order entered in this action (ECF No. 15). UIC therefore requests to file the

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SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.
Dated: DEC 17 2019

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Hon. George B. Daniels
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above documents under seal to avoid public disclosure of sensitive information. UIC will promptly provide Your Honor with unredacted versions of these documents.

Respectfully submitted,

/s/ Jamie A. Levitt
Jamie A. Levitt

CC: All counsel of record (via ECF)